

KING & SPALDING LLP  
1185 AVENUE OF THE AMERICAS  
NEW YORK, NEW YORK 10036

---

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP  
1285 AVENUE OF THE AMERICAS  
NEW YORK, NEW YORK 10019

January 27, 2020

**VIA E-MAIL  
AND ECF FILING**

The Honorable Martin Glenn  
United States Bankruptcy Court  
Southern District of New York  
Alexander Hamilton Custom House  
One Bowling Green  
New York, New York 10004

**Re: In re Motors Liquidation Company, *et al.*  
Case No. 09-50026 (MG)**

Dear Judge Glenn:

Counsel for General Motors LLC ("New GM") writes in response to the Court's January 23, 2020 *Order Regarding Proposed Scheduling Order For Briefing Late Claims Motions* [Docket No. 14655], permitting any party to file an objection to the *Proposed Scheduling Order* [Docket No. 14654] (the "Proposed Order") submitted on January 15, 2020 by the Motors Liquidation Company GUC Trust ("GUC Trust"), or to submit its own proposed order by 5:00 p.m. on Monday, January 27, 2020.<sup>1</sup>

New GM has no objection to the Proposed Order, which contemplates, among other things, (i) an extension, until February 17, 2020, of the deadline for parties to submit a proposed briefing schedule for all matters related to the late claim motions filed by the Economic Loss Plaintiffs, (ii) a proposed briefing schedule, commencing on March 27, 2020, concerning the PIWD Late Claims Motions, and (iii) a proposed briefing schedule, also commencing on March 27, 2020, for further briefing regarding the AAT Distribution Motion.

New GM notes that, given the interplay between the AAT Distribution Motion and the Economic Loss Plaintiffs' late claim motions, it may be more efficient to determine an appropriate briefing schedule for the AAT Distribution Motion at such time that the parties submit their

---

<sup>1</sup> Capitalized terms used and not defined herein have the meanings ascribed to them in the Proposed Order.

Honorable Martin Glenn  
January 27, 2020  
Page 2

schedule for further proceedings concerning matters related to the Economic Loss Plaintiffs.

Further, New GM understands that the AAT may oppose the Proposed Order as it relates to the AAT Distribution Motion, and may request that the schedule be revised to accelerate the briefing schedule and reverse the briefing order so that other parties in interest must first object to the AAT Distribution Motion and the AAT would then reply. New GM opposes the AAT's proposed changes. As the party seeking affirmative relief, the AAT should submit its supplemental brief first. As the Court is aware, New GM and the Economic Loss Plaintiffs have already filed objections to the AAT Distribution Motion.

Finally, considering the fluid nature of this matter, New GM respectfully requests a status conference and/or chambers' conference at the Court's convenience to address the issues raised herein regarding the establishment of a briefing scheduling concerning the AAT Distribution Motion and the timing and sequencing thereof. Should the Court agree that such a conference is appropriate, New GM will make itself available at the Court's convenience.

We are available should the Court have any questions.

Respectfully submitted,

/s/ Paul M. Basta

Paul M. Basta

Kyle J. Kimpler

PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP

1285 Avenue of the Americas

New York, New York 10019

Telephone: (212) 373-3000

Facsimile: (212) 757-3990

*and*

Arthur Steinberg

Scott Davidson

KING & SPALDING LLP

1185 Avenue of the Americas

New York, New York 10036

Telephone: (212) 556-2100

Facsimile: (212) 556-2222

*Counsel for General Motors LLC*